

### **REMARKS/ARGUMENTS**

**Claims 1-3 and 19-22 are rejected under 35 USC 103a as being unpatentable over Joch et al. (US 7,227,901).**

Applicant asserts that independent claim 1 should not be found unpatentable over Joch et al. because Joch et al. does not teach each and every limitation as claimed in the present invention. In particular, the applicant asserts that Joch et al. do not teach or suggest at least the following feature:

“wherein filtering the pixels around the block boundary comprises first filtering the pixels at the block boundary and next filtering pixels not adjacent to the pixels at the block boundary.” (claim 1 – emphasis added)

In the rejection of claim 1, the Examiner stated in the Office action of 01/31/2008, “first filtering the pixels at the block boundary (120, YES, of fig.5, see also figs. 3b and 6) and next filtering pixels not adjacent to the pixel at the block boundary (122 of fig.5; see also figs. 3b and 6)”. However, the applicant respectfully disagrees.

In particular, step 120 is merely a determination as to whether the macroblocks 24 are intra-coded. No filtering operation is applied in this step. See col. 16, lines 45-46 stating, “In step 120, a further determination is made as to whether macroblocks 24 are intra-coded.” The applicant respectfully points out that a determination as to whether macroblocks 24 are intra-coded is not equivalent or similar to first filtering the pixels at the block boundary, as was stated by the Examiner.

Secondly, step 122 describes applying a default filter. For example, continuing the above quotation from Joch et al., col 16, lines 45-50 state, “If the macroblocks 24 are not intracoded, then a default filter is applied in step 122, in which the edges 47 with  $B_s < 4$  are filtered by computing the filtered samples  $P_0$  and  $Q_0$  based on the  $\Delta(\triangle)$ .” Referring to fig. 3a, the default filter in step 122 filters pixels  $P_0$  and  $Q_0$ , which are the pixels at the block

boundary 47. Therefore, step 122 is clearly not equivalent to next filtering pixels not adjacent to the pixels at the block boundary, as was stated by the Examiner.

Finally, concerning fig. 3b, fig. 3b of Joch et al. merely shows a relationship between unfiltered samples and activity thresholds, wherein the content activity check performed in  
5 step 112 of fig. 5 is done by comparing differences in the unfiltered sample values P0 and Q0 across the boundary 47 against the activity threshold ALPHA. The difference in the unfiltered sample values P0 and P1 on one side of the boundary 47 and unfiltered sample values Q0 and Q1 on the other side of the boundary 47 are compared against the activity threshold and BETA. Such operation is described in col. 13, lines 23-47. Step 112 determines whether  
10 sample line is to be filtered in the following steps. For example, col. 14, lines 48-52 states, "The content activity check (112) determines whether each sample line is to be filtered and uses the following specific values for  $\alpha$  and  $\beta$  (114) as shown in Table 3 below". In this way, it is clear that fig. 3b does not relate in anyway to the missing feature of the present invention of "first filtering the pixels at the block boundary and next filtering pixels not  
15 adjacent to the pixels at the block boundary".

For at least the above reasons that Joch et al. do not teach or suggest all the features of the present invention, the applicant asserts that claim 1 should be found allowable with respect to the cited reference of Joch et al. In particular, the sections of Joch et al. relied on by the Examiner's rejection do not support the Examiner's rejection. Claims 2-22 are dependent  
20 claims and should therefore be found allowable for at least the same reasons as base claim 1. Reconsideration of claims 1-22 is respectfully requested.

**Claim 4 is rejected under 35 USC 103a as being unpatentable over Joch et al. (US 7,227,901) in view of Ameres et al. (US 7,027,654).**

25 As previously mentioned, claim 4 is dependent upon base claim 1, which is believed allowable by the applicant for at least the above stated reasons. In this way, claim 4 should also be found allowable for the same reasons as base claim 1. Reconsideration of claim 4 is respectfully requested.

**Claim 18 is rejected under 35 USC 103a as being unpatentable over Joch et al. (US 7,227,901) in view of Hsu et al. (US 2005/0013497).**

5 As previously mentioned, claim 18 is dependent upon base claim 1, which is believed allowable by the applicant for at least the above stated reasons. In this way, claim 18 should also be found allowable for the same reasons as base claim 1. Reconsideration of claim 18 is respectfully requested.

10 **Allowable Subject Matter – Claims 5-17 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.**

The applicant thanks the Examiner for the indication of the allowable matter.

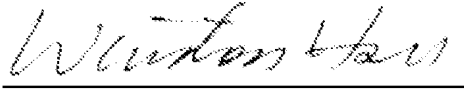
**Conclusion:**

15 Thus, all pending claims are submitted to be in condition for allowance with respect to the cited art for at least the reasons presented above. The Examiner is encouraged to telephone the undersigned if there are informalities that can be resolved in a phone conversation, or if the Examiner has any ideas or suggestions for further advancing the prosecution of this case.

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Sincerely yours,



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- 10 Note: Please leave a message in my voice mail if you need to talk to me. (The time in D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)